UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-V-

NOTICE OF MOTION

CASE NO. 19-CR-088 (GTS)

MIRKO RALLI-FALCONI,

Defendant.

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law, Affidavits and Indictment and all other proceedings heretofore had herein, a Motion will be made as follows:

DATE, PLACE AND TIME OF MOTION: On May 16, 2019 before the Honorable Glenn T. Suddaby, Chief United States District Court Judge for the United States District Court for the Northern District of New York, James M. Hanley Federal Building, 100 South Clinton Street, Syracuse, New York, at 10:00 AM, or as soon thereafter as counsel can be heard.

TYPE OF MOTION: Defendant seeks an Order of the Court suppressing any and all evidence, including physical evidence and statements attributed to him, seized and derived from a stop and his subsequent arrest on February 26, 2019; an Order granting the Reservation of Rights to make additional motions; and for such other and further relief as the Court may deem just and proper.

DATED: April 17, 2019

Syracuse, New York

LISA A. PEEBLES Federal Public Defender

By: <u>S/G</u>

S/Gabrielle DiBella

Assistant Federal Public Defender

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Mirko Ralli-Falconi